June 03, 2016

MEMORANDUM TO:

Line Office Assistant Administrators, Staff Office

Directors, and

Chief Financial Officers

FROM:

Kim Darling KM Dand Director, Finance Office/Comptr

SUBJECT:

Conferences Memorandum 16-02

Below are the revised conference guidelines, which supersede Conferences Memorandum 14-01.

Purpose:

NOAA will adhere to the Department of Commerce (DOC) Conference Policy. The purpose of this memorandum is to provide guidance to Line and Staff Offices (L/SO) on conferences.

Background:

On September 2, 2011, the Office of Management and Budget (OMB) issued Memorandum 11-35, "Eliminating Excess Conference Spending, and Promoting Efficiency in Government." In that memorandum, OMB instructed all agencies "to conduct a thorough review of the policies and controls associated with conference-related activities and expenses." In addition, Deputy Secretaries (or their equivalents) are required to review thoroughly the policies and management controls associated with conference-related activities and expenses in order to mitigate the risk of inappropriate spending.

OMB further expanded upon these efforts, with Memorandum 12-12, "Promoting Efficient Spending to Support Agency Operations," issued May 11, 2012 which; "outlines a series of new policies and practices for conference sponsorship, hosting, and attendance to ensure that Federal funds are used appropriately on these activities, and that agencies continue to reduce spending on conferences where practicable." The policies and practices require:

- Senior level review of all planned conferences
- Senior level approval of all future conference expenses in excess of \$100,000
- Prohibiting expenses in excess of \$500,000 on a single conference
- Reporting publicly on all conference expenses in excess of \$100,000

In addition, Section 3003(a) of the *Consolidated and Further Continuing Appropriations Act*, 2013 requires that Executive Branch Departments report to the Inspector General, on an annual basis, conferences sponsored or co-sponsored, or hosted or co-hosted, where the Government's actual costs exceed \$100,000.

Per FY13 Appropriations Bill, <u>H.R. 933, Other Matters</u>, <u>Sec. 3003</u>, the Head of any Executive Branch department holding (sponsored/co-sponsored or hosted/co-hosted) a conference must notify the Inspector General (IG) of the date, location, and number of employees attending a conference for which the cost to the government was **more than \$20,000**. This notification shall occur **within 15 days** of the date the conference was held.

Policy:

All Line and Staff Offices (L/SO) are required to ensure various approvals are in place prior to any sponsored or co-sponsored, hosted or co-hosted, or attended conferences. The approval levels for conferences are based on the following:

ALL Conferences of \$100,000 or more: Regardless of whether the costs are attended only or sponsored/co-sponsored or hosted/co-hosted, these conferences need to be approved by the following individuals: Assistant Administrator (AA)/Staff Office Directors, NOAA Chief Financial Officer (NCFO), the Deputy Under Secretary for Operations (DUS/O), and NOAA Chief of Staff the Department. The Line or Staff office approval step cannot be delegated below the Deputy Assistant Administrator/Deputy Staff Office Directors. Conferences of \$100,000 or more may or may not also require a NOAA group travel request.

ALL Conferences less than \$100,000: Also approved by the AA/Staff Office Directors and the "NOAA Conference Approval Form - Under \$100K" form must be submitted to the conferences e-mail. Additionally, conferences need to be reported to the IG within 15 days through the OCFO. Conferences of \$100,000 or less may or may not also require a NOAA group travel request.

Additionally, NOAA has developed the following documents to assist the L/SO's implement the policy:

- 1. Conference & Group Travel Decision Flow Chart
- 2. Conference Procedural Guidance for Conferences Under \$100,000
- 3. Conference Procedural Guidance for Conferences Equal or Over \$100,000
- 4. NOAA Conference Approval Form Under \$100K
- 5. NOAA Conference Detail

(see http://www.corporateservices.noaa.gov/finance/GROUP.html)

The NOAA OCFO is the lead office for collecting conference-spending data that is reported by the L/SO to the Department. In addition, the OCFO is leading the data validation process for the quarterly submissions. OCFO approach includes selecting samples, requesting and reviewing the supporting documentation, and validating the reported conference spending. L/SO with conferences totaling support equal or over \$100K are required to submit their reports

monthly to the NOAA OCFO to allow the conference data to be reviewed. Conference information is required to be reported when:

- 1. Sponsored/hosted, or attended conference actual costs exceed \$100,000;
- 2. Co-sponsored/co-hosted conference with a non-Government entity, where the L/SOs contribution exceeded \$100,000; and/or
- 3. Co-sponsored/co-hosted conference with another Federal entity where the total cost of the Federal contribution exceeded \$100,000.

Monthly data calls by the NOAA OCFO will be issued to the L/SO with instructions on reporting conference information. For all conferences, completion of a spreadsheet providing details on conference travelers and a copy of all other pertinent contract information is required to support conference costs. Copies of the travel vouchers are not required with the worksheet submission, but may be requested later if selected by the NOAA OCFO for review. Reported conference information is subject to an Office of Inspector General audit and review.

Bi-monthly data calls by the NOAA OCFO will be issued to the L/SO for sponsored/co-sponsored and hosted/co-hosted conferences for which the cost to the Government was more than \$20,000 in order to meet one of the Department's reporting requirements. For these conferences the Department must notify the Inspector General (IG) of the date, location, and number of employees attending the conference.

Please note, the conference approval and group travel approvals are two separate things. Not all conferences require group travel (though most do) and not all group travel requests are conferences.

Conference Validation:

All L/SO are responsible for compiling the actual costs for conferences on the NOAA Conference Costs Breakdown spreadsheet within two (2) weeks of the end of the conference. For conferences that are sponsored/co-sponsored and hosted/co-hosted this data must be provided to OCFO within two (2) weeks of the end of the conference. Additional information may be subsequently requested by OCFO in order to complete the conference cost validation per DOC policy.

The actual NOAA Conference Costs Breakdown spreadsheet for all conferences must be maintained by the L/SO and retained at the L/SO for six years and three months in accordance with records retention requirements for financial documents. If electronically stored, the documents must be stored on a shared drive accessible in the event of an audit. After six years and three months, the electronic and paper files may be disposed.

Detailed guidance regarding conferences can be found in the following conference policy and procedure resources:

NOAA Conference and Group Travel Policy Website: http://corporateservices.noaa.gov/~finance/GROUP.html

Conference Procedural Guidance for Conferences Equal to or Over \$100,000: http://corporateservices.noaa.gov/~finance/documents/ConferenceProceduralGuidanceforConferenceSequaltoorOver100k.docx

Department of Commerce Conference Policy: http://www.osec.doc.gov/ofm/OAP/TMD/Documents/DOC_Conference_Policy_FINAL_rev12Sept2014.pdf

If you have any questions on the policy or procedure for conferences, please e-mail conferences grouptravel@noaa.gov.